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# PATENT OWNER'S DEMONSTRATIVE EXHIBITS

NOVEMBER 7, 2023

ORAL ARGUMENT

**APPLE INC.**

v.

**SMART MOBILE TECHNOLOGIES LLC**

U.S. PATENT NO. 8,982,863 B1

**IPR2022-01222**

GREER N. SHAW, COUNSEL FOR PATENT OWNER

**PETITIONER FAILS TO SHOW  
SEPARATE SERVER AND  
NETWORK SWITCH BOX  
COMPONENTS**



# The claimed “server” and “network switch box” are separate components

(12) **United States Patent**  
Rao et al.

(10) **Patent No.:** US 8,982,863 B1  
(45) **Date of Patent:** Mar. 17, 2015

1. A system for controlling Internet Protocol (IP) based wireless devices, IP based cellular phones, networks or network switches by servers comprising:

an IP enabled wireless device including a portable device or a cellular phone, said IP enabled wireless device comprising a plurality of antennas and ports, wherein the IP enabled wireless device is configured for voice and data communication and comprises a plurality of transmit and receive units;

a first server connected to at least one internet protocol enabled network, said server configured with a controller in communication with a plurality of network devices; and

a network switch box, wherein the network switch box is configured with a plurality of ports, wherein the network switch box is connected to at least two networks, wherein the network switch box is configured to transmit and receive one or more data packets between the at least two networks.

14. A system comprising internet enabled communication devices and servers, including an Internet Protocol enabled wireless mobile device for voice and data communication, a plurality of antennas, said system comprising:

a mobile device for voice and data communication;

a first network switch box and a second network switch box, and wherein the first network switch box and the second network switch box are configured to operate on a plurality of networks, wherein the first network switch box and the second network switch box are connected to each other with a wired and/or wireless interface; wherein the first network switch box and the second network switch box are configured to transmit and receive a plurality of data streams;

a server, wherein the server is configured for communication with the first network switch box and the second network switch box, and a communication protocol to control the network path of the first network switch box and the second network switch box using a communication protocol.



# The claimed “server” and “network switch box” are separate components

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,

SMART

Thus, whether Ahopelto’s GGSNs’ “server functionality” and “route  
functionality” have distinct hardware is irrelevant. *Contra* POR, 8. Instead,  
question is whether a POSITA would have found the claimed “server” and  
“network switch box” obvious from Ahopelto’s logically distinct GGSN fun  
teachings. The Petition demonstrated that Ahopelto’s GGSN includes the “

TO P



# Petitioner maps both the “server” and “network switch box” to Ahopelto’s GGSN

UNITED STATES PATENT AND TRADEMARK OFFICE

BEFORE THE PATENT TRIAL AND APPEAL BOARD

APPLE INC.,  
Petitioner,

v.

SMART MOBILE TECHNOLOGIES LLC  
Patent Owner.

IPR2022-01222  
U.S. Patent No. 8,982,863

PETITION FOR *INTER PARTES* REVIEW  
UNDER 35 U.S.C. § 312 AND 37 C.F.R. §

First, Ahopelto renders obvious “servers,” because Ahopelto discloses a GPRS gateway support node (“GGSN”) with functionality that determines how to forward a packet based on the packet’s protocol type (referred to simply herein as “server functionality”). Ex.1005, 7:35-42, 8:40-41 and 10:22-23, 48-50, 56-59. The GGSN’s server functionality for making the determination is a “server.” Figure 1 illustrates multiple GGSNs within a GPRS system, each having the same type of server functionality (and, therefore, disclosing “servers”). Ex.1005, FIG. 1:



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